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UNITED STATES DISTRICT COURT

SOUTHERN DISTRICT OF CALIFORNIA

(HONORABLE JEFFREY T. MILLER)

UNITED STATES OF AMERICA, Plaintiff, v. LAURA YESENIA MENDOZA-DELGADILLO, Defendant.	Case No. 07CR2979-JM DATE: December 7, 2007 TIME: 11:00 a.m. NOTICE OF MOTIONS AND MOTIONS TO: (1) COMPEL DISCOVERY; (2) PRESERVE EVIDENCE; AND (3) GRANT LEAVE TO FILE FURTHER MOTIONS.

TO: KAREN P. HEWITT, UNITED STATES ATTORNEY, AND
AARON B. CLARK, ASSISTANT UNITED STATES ATTORNEY:

PLEASE TAKE NOTICE that on December 7, 2007, at 11:00 a.m., or as soon thereafter as counsel may be heard, defendant, Laura Yesenia Mendoza-Delgadillo, by and through her attorneys, Kris J. Kraus, and Federal Defenders of San Diego, Inc., will ask this Court to enter an order granting the following motions.

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MOTIONS

Defendant, Laura Yesenia Mendoza-Delgadillo, by and through her attorneys, Kris J. Kraus, and Federal Defenders of San Diego, Inc., asks this Court pursuant to the United States Constitution, the Federal Rules of Criminal Procedure, and all other applicable statutes, case law, and local rules for an order to:

(1) Compel Discovery;

(2) Preserve Evidence; and

(3) Grant Leave to File Further Motions.

These motions are based upon the instant motions and notice of motions, the attached statement of facts and memorandum of points and authorities, the files and records in the above-captioned matter, and any and all other materials that may come to this Court's attention prior to or during the hearing of these motions.

Respectfully submitted,

Dated: November 27, 2007

/s/ Kris J. Kraus

KRIS J. KRAUS
Federal Defenders of San Diego, Inc.
Attorneys for Ms. Mendoza-Delgadillo
Kris_Kraus@fd.org

CERTIFICATE OF SERVICE

Counsel for Defendant certifies that the foregoing pleading is true and accurate to the best of her information and belief, and that a copy of the foregoing document has been served this day upon:

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Dated: November 27, 2007

/s/ Kris J. Kraus
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